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February 2, 2023

VIA ELECTRONIC MAIL

Y. Gloria Park, Esq.
Susman Godfrey LLP
1301 Avenue of the Americas, 32nd Floor
New York, NY 10019

RE: Petro Industrial Solutions, LLC v. Island Project and Operating Service, LLC,
et. al., Case No. 1:21-CV-00312

Dear Attorney Park:

Your letter of February 2, 2023, is nonsensical. I asked for and got from all parties what dates each was available for depositions and put together the dates everyone had. I cannot manufacture dates that are not there. The first date everyone is available is April 28, 2023. That is not my doing, that is everyone's calendar's doing.

Please verify that there is no need for further need to meet and confer on the issue of more than ten depositions. There are five Defendants in this case, and clearly each of the ten can take ten, but your position that the Plaintiff can only take a total of ten is unreasonable. I am surprised you would want to bill your client for the fight.

If you schedule one deposition a day, the depositions will extend until the end of July. The witnesses I grouped appeared to do not have a lot of knowledge, and, as such, their depositions should not take more than two hours each. However, no one can know that for sure until they are deposed.

I don't have a letter from you dated January 30th, 2023, I do have one from January 27th, 2023, as to depositions for VITOL, which are on dates the parties are not all available.

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I will notice Sebastian Meretti for May 25, 2023. Please be aware, Attorney Francis only has the morning on that date, and, as such, that deposition may not be completed on that day.

While you have offered Tim Kologinczak on May 24, 2023, Attorney Francis is only available in the afternoon. While you offer April 25, 2023, that is not a date on which all parties are available. As such, I will notice his deposition for May 23, 2023, per your suggestion.

While you have offered Charlotte Horowitz for May 18, 2023, and June 6, 7, 8, 2023 again, those are not dates also counsel are available. You constantly offering witnesses for dates that are not available, is a waste of everyone's' time. I will notice her and VI VITOL from May 19, 2023.

Pursuant to your demands, the deposition schedule will now appear to be:

Date:	Deponent:
April 28, 2023	Petro Industrial Solutions, LLC, and Adrian Melendez, Sr.
May 19, 2023	Charlotte Horowitz and 30(b)(6) Vitol Virgin Islands Corp
May 22, 2023	Rawle Granger and Chetram Persaud
May 23, 2023	Terrence Keogh and Andreas Constantinou
May 24, 2023, morning	Garry Stoker and Kenia Johny
May 25, 2023, afternoon	Sebastian Meretti
June 14, 2023	30(b)(6) Versa Integrity and Acuren Inspection Services
June 15, 2023	30(b)(6) Vitol US Holdings II, Co.
June 16, 2023	Andrew Canning and 30(b)(6) OPTIS Europe, Ltd.
June 19, 2023, afternoon	30(b)(6) Traeger Brothers
June 20, 2023	Elias Rivera and Coury Hodge
June 21, 2023	David Smith and IPOS
June 22, 2023	Martin Figueira and IPOS

Since you refuse to allow depositions in July, those other requested depositions cannot be scheduled. Please let me know if this works for you.

Cordially,



Lee J. Rohn, Esq.

LJR/kj

cc: Carl A. Beckstedt, III, Esq.
Alex Kaplan, Esq.
Simone Francis, Esq.
Andrew Simpson, Esq.